

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-11340 DPW

\*\*\*\*\*  
STEPHEN KEEFE, \*  
Plaintiff \*  
 \*  
v. \*  
 \*  
LOCAL 805, INTERNATIONAL \*  
LONGSHOREMEN'S ASSOCIATION, AFL-CIO, \*  
LOCAL 800, INTERNATIONAL \*  
LONGSHOREMEN'S ASSOCIATION, AFL-CIO, \*  
and LOCAL 799, INTERNATIONAL \*  
LONGSHOREMEN'S ASSOCIATION, AFL-CIO, \*  
Defendants \*  
\*\*\*\*\*

**PLAINTIFF'S MOTION  
TO AMEND SCHEDULING ORDER (ASSENTED TO)**

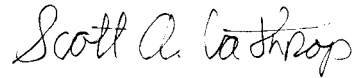
Plaintiff Stephen Keefe hereby moves this Court to extend the dates in the scheduling order originally entered on December 12, 2004, as follows:

Discovery completed: November 30, 2005;  
Dispositive motions: January 16, 2006; and  
Oppositions: February 28, 2006.

This extension is necessary because of the case load of plaintiff's counsel and because of serious illness in defendants' counsel's immediate family and upcoming and related treatments. These conditions continue to require defendant's counsel's attention during August and September, 2005.

The undersigned has communicated with counsel for the defendants, and he has indicated that he has no opposition to this motion.

Stephen Keefe  
By his attorney




---

Scott A. Lathrop, Esq.  
Scott A. Lathrop & Associates  
122 Old Ayer Road  
Groton, MA 01450  
(978) 448-8234  
BBO No. 287820

Dated: August 19, 2005

Certificate of Service

I, Scott A. Lathrop, hereby certify that I have served the foregoing Motion on the defendants by mailing this day a copy to the last known address of their Attorney of Record.



---

Scott A. Lathrop

Dated: August 19, 2005